

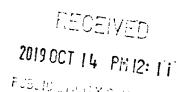
Control Number: 49737



Item Number: 135

Addendum StartPage: 0

SOAH DOCKET NO. 473-19-6862 PUC DOCKET NO. 49737



8	* *
8	FUBLID FILLEY
8	BEFORE THE STATE OFFICE $^{\circ}$
8	OF
§	ADMINISTRATIVE HEARINGS
§	
§	
	<i>\$</i> \$\tau\$ \$\tau\$ \$\tau\$ \$\tau\$ \$\tau\$ \$\tau\$ \$\tau\$ \$\tau\$

STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER

Certain documents provided in response to Texas Industrial Energy Consumers' (TIEC) Fourth Request for Information to Southwestern Electric Power Company (SWEPCO), Question No. 4-4 are exempt from public disclosure pursuant to Sections 552.101, 552.104, and 552.110 of the Public Information Act¹ and are subject to treatment as Highly Sensitive protected materials.

The materials provided in response to TIEC's RFI No. 4-4 contain non-public commercially sensitive operational data and compilations, that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Highly Sensitive materials designation given to them.

¹ Tex. Gov. Code Ann. § 552.001-.353 (West 2012 & Supp. 2018).

Respectfully submitted,

Rhonda Colbert Ryan State Bar No. 17478800

AMERICAN ELECTRIC POWER SERVICE CORPORATION

400 West 15th Street, Suite 1520

Austin, Texas 78701

Telephone: (512) 481-3321 Facsimile: (512) 481-4591

William Coe

State Bar No.00790477

Kerry McGrath

State Bar No.13652200

Stephanie Green

State Bar No. 24089784

DUGGINS, WREN, MANN & ROMERO, LLP

600 Congress Ave., Suite 1900

Austin, Texas 78701

Telephone: (512) 744-9300 Facsimile: (512) 744-9399

Stephanie Green

ATTORNEYS FOR SOUTHWESTERN ELECTRIC POWER COMPANY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served via electronic mail, facsimile, hand-delivery, overnight delivery, or First Class U.S. mail on all parties of record in this proceeding on October 14, 2019.

Herburi Green